

REMARKS

This communication is responsive to the Office Action dated May 30, 2002. By this response, Applicant has cancelled claim 24 and amended claims 20, 28 and 29. Fifteen claims (3 independent and 12 dependent) remain pending in this Application. Support for the claims (3 independent and 12 dependent) remain pending in this Application. Support for the amendments is found in the Specification, claims and drawing figures as originally filed, for example at page 16, lines 5 and 13. No new matter is added by this Amendment. Applicant believes that no fee is required by this response; should any fee be necessary (including any fees for extensions of time or additional claims), however, the Commissioner is authorized to deduct such fee from Deposit Account 19-2814. **This response is being filed by facsimile only.**

Applicant notes with appreciation that the Examiner has withdrawn the finality of the previous Office Action. Response to the each of the matters raised in the most recent Office Action is contained herein.

Prior Art Rejections

The Office Action rejects all claims under 35 U.S.C. sec. 103, citing United States Patent No. 6,226,623 ("Schein") in view of U.S. Patent No. 6,047,267 ("Owens"). Applicant respectfully traverses the rejection in that neither of the references, taken alone or in combination, describes each and every limitation found in the present claims. In particular, neither reference (nor the combination of the references) expressly or impliedly discloses at least the element an to the effect that *each of said stored value products is associated with at least one of a plurality of client systems* as recited in the amended independent claims.

Applicant has amended each of the pending independent claims to clearly recite that each of the stored value products is associated with at least one of a plurality of client systems. This feature enables multiple stored value programs to be created and administered from a common platform. Although each of the stored value programs may be created from a common repository of objects and may share data using a common server interface, each stored value product is associated with a separate client system. This benefit provides great advantages over the prior art systems of record, as set forth in the Specification. In

particular, the invention allows multiple clients to create individualized stored value programs in a quick and easy fashion using a common repository of objects.

As pointed out in the previous responses submitted by Applicant, the Schein reference describes a communication and messaging network for use by a bank (see, e.g., Abstract and col. 9, lines 1-13). The Schein system merely allows customers and bankers to access their various personal banking records (including checking and savings accounts, investment accounts, mortgages and the like) from remote locations (such as branch offices or from home) via telephone, personal computer, etc. (see, e.g., col. 10, lines 14-27). In other words, Schein in no way creates, administers or facilitates multiple stored value products (e.g. smartcard programs)..

In particular, the Schein language cited in the Office Action (col. 9, line 62 through col. 10, line 7) as disclosing Applicant's claimed element of *"a database server configured to support each of the stored value products, to receive said transaction data from said transaction data capture module, and to route said transaction data among said plurality of stored value products"*, makes no mention whatsoever of stored value products, capturing transaction data, or routing transaction data. To the contrary, the language merely states that the Schein system is accessible from home PCs, cash machines, teller workstations, and the like. Similarly, the language cited by the Office Action against prior claim 24 as disclosing *"a plurality of clients"* (col. 7, lines 13-33) merely describes a list of conventional banking services. While the list of banking services does include smart cards, no mention whatsoever is made of client systems associated with at least one of the plurality of stored value products as recited in the pending claims and as described in the present Specification.

Further, as noted in Applicant's response to the previous Final Office Action, the Schein reference is not concerned with building or operating stored value products, and as such would have no need for a database or repository of objects suited for such a purpose. Accordingly, the Schein reference fails to expressly or impliedly disclose at least a system *"wherein each of said stored value products comprises a plurality of objects retrieved from said database, and wherein each of said plurality of objects provides a function that is available to each of the plurality of stored value products such that each of said plurality of stored value products is allowed to retrieve said customer data and said merchant data from*

said database", as recited in claim 20. Similarly, the reference fails to disclose each and every element of independent claims 28 and 29, particularly a database or repository including a plurality of objects. The Schein reference therefore fails to anticipate multiple aspects of the claimed invention. As described below, there is no suggestion or motivation to combine the Schein system with other technologies, particularly since the Schein reference relates to messaging/communication systems rather than systems for facilitating transactions.

Accordingly, the Schein reference is in no way concerned with an element to the effect that *a system for creating and administering a plurality of stored value products, a server facilitating the operation of a plurality of stored value programs, and/or a method of facilitating financial transactions at a server* as recited by the three independent claims. Further, the Schein reference does not disclose a system or method for creating or operating multiple stored value products associated with multiple client systems, as recited by the various amended claims of the present Application.

Similarly, the Owens reference cited in the Office Action fails to disclose or suggest the remaining elements in the pending claims. Although the Office Action does not cite Owens against particular claims or claim elements, the reference is described as disclosing "an object-oriented design in a multi-product, online and Internet environment". While Applicant does not dispute that Owens describes an online system that is implemented using an object-oriented model, the Owens disclosure is far removed from the field of the present invention. Owens deals specifically with a program (such as an online wallet) that could be used by Internet consumers to purchase goods or track funds using various bank accounts. The reference in no way deals with creating, administering or facilitating stored value programs, nor does it deal with a back-end transaction processing system of any sort. Accordingly, there is no suggestion or motivation to combine the two references without impermissibly using Applicant's claims as a guide. Moreover, even the cited combination of the two references does not disclose a system that would allow creation or administration of multiple stored value programs on multiple client systems, as recited by the amended claims and as described more fully above.

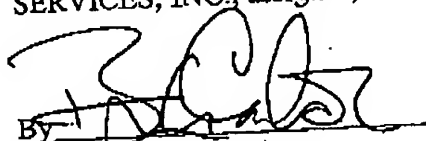
Hence, neither of the references (nor the combination of the two) describes a system for creating and/or facilitating a stored value program/product, nor do either (or both)

describe a system for facilitating stored value products/programs associated with a plurality of client systems, as recited by the various independent claims. Because even the combination of the cited references fails to anticipate each and every element of the independent claims, the dependent claims are believed to be patentable *a fortiori* and a detailed response to each of the dependent claim rejections is not necessary at this time. Nevertheless, Applicant reserves the right to independently demonstrate the patentability of any element found in the dependent claims at a later date.

In conclusion, Applicant respectfully submits that the present application is in condition for allowance, and earnestly solicits a Notice of Allowance at the Examiner's earliest convenience. The Examiner is invited to telephone the undersigned if such would advance prosecution of this Application in any way.

Dated this 30th day of August, 2002.

Respectfully submitted on behalf of
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